Dear Commissioners,

At this time, the 2010 stock assessment is not yet available and several of the papers detailing the rationale for new policies recommended by the staff have only been released in the last few days. Due to the holidays, staff is not available to engage in a dialogue about the recommendations. For these reasons, the Alaska Longline Fishermen's Association (ALFA) cannot provide specific recommendation on the 2011 catch limits. However, since comments are due by December 31, 2010, we have prepared the below comments for your review.

Overview
ALFA’s membership was staggered by the staff’s 2011 catch limit recommendations. We are extremely concerned by the apparent failure of the existing stock assessment and apportionment strategy to bring stability to the fishery. It is difficult for our membership to understand why catch limit increases are recommended in two portions of Area 2 and a 47% decrease is recommended in the third—only a line in the water away. Likewise, the substantial decrease in the 3A and 3B catch limits are alarming when the staff hailed 3A as its healthy “poster child” two years ago and predicted 3B would stabilize once the accumulated “surplus” was harvested. In short, ALFA finds the 2011 catch limit recommendations contradictory and difficult to support. We remain concerned about halibut stocks and committed to long-term sustainable management. We hope that working together in January the staff, the stakeholders, and the Commissioners can chart a path to healthy stocks and a more stable management process.

2C Charter Overage
The dramatic catch limit reduction the staff has recommended for Area 2C has only heightened ALFA’s concerns regarding the chronic overharvest by the Southeast halibut charter industry. The inability of the National Marine Fisheries Service (NMFS) to restrain halibut charter harvest to the 2C Guideline Harvest Level (GHL) is untenable. The 2C charter fleet has exceeded it allocation every year since 2004, with the cumulative overage now approaching 4 million pounds. The 2C charter allocation has not been reduced for two years, despite drastic reductions in the commercial catch limit.
At minimum, the charter overages must be stopped. With great urgency, ALFA requests that the Commission implement charter harvest restrictions to control 2C charter harvest to the established 2011 GHL.

The IPHC Management Process
Before addressing issues specific to this year's stock assessment, as much as we understand it to date, ALFA asks that the Commissioners consider the following relative to the IPHC management process in general.

During the 2010 interim meeting, IPHC staff presented several new and significant changes to harvest policies and apportionment methods when making the 2011 recommendations. This marks at least the 5th year in a row of constantly changing harvest policies, apportionment formulas, and data sets with apparently more to come next year. This constant ad-hoc approach to halibut management is having significant negative impacts and undermining the credibility of halibut management in the eyes of many stakeholders. **ALFA members urge the Commission to end this ad-hoc approach to halibut management in favor of a more deliberative process for changing harvest policy and apportionment.**

Three elements common to a deliberative halibut management policy have repeatedly been identified during IPHC Conference Board deliberations, stakeholder comments, recommendations from the April 2009 apportionment workshop, and again during the September 2009 bycatch workshop. These are:

1. Significant policy changes recommended by staff should be presented at least one year in advance of their inclusion in staff recommendations to allow time meaningful stakeholder review and comment. The current practice of IPHC staff developing the annual catch limit recommendations based on internal studies that have not yet been presented to Commissioners or stakeholders should be curtailed.

2. Measurable outcomes associated with harvest policy or model changes, by area, should be clearly articulated using a five to ten year time horizon and the existing stock structure and age distribution as a starting point. The expected outcomes should be ground-truthed against observed past and present data on an area specific basis. A simple predictive tool, such as the current widget, could be adapted to provide this opportunity to ground-truth by seeding the widget model with observed stock structures over the past 10-15 years and then running the model with the proposed changes. This would allow evaluation of the anticipated benefits over a ten year time frame based on the existing stock structure, and provide a means to compare the predicted effect of the proposed changes with the actual effect.

3. Harvest policies should be stable for at least five years to reduce volatility and allow time for the effects of the harvest policy to be evaluated.

ALFA offers these suggestions in a sincere effort to improve the halibut management process. Our membership is deeply vested in the long-term health of halibut stocks and highly values the halibut resource. We have the highest regard for the IPHC staff, and
believe the identification of a more deliberative management process would benefit both stakeholders and the resource.

Below are ALFA’s comments on the staff’s 2011 catch limit recommendations as they have been described to date.

**2011 Stock Assessment and Management Policies**

**Slow Up – Full Down**

The current harvest policy rule of Slow-Up, Fast Down (SUFD) was first implemented in 1998 in response to dramatic catch limit reductions driven by new information regarding the potential effectiveness of bait used in the survey. At that time, SUFD was seen as a means to reduce volatility while allowing for further study of new information. Over the years, SUFD has been an important tool to allow staff to refine and test new information and methods in the stock assessment, data sets, and harvest policies without causing undue volatility. Some example of this are the bait corrections of 1998, the rapid increase in the Area 3B catch limit from 1998 to 2003, the change to a sex specific model in 2006, and the still undecided method to apportion catch between areas using the coast-wide assessment model. IPHC staff have noted that the asymmetric nature of SUFD (fast down) adds a further measure of conservation not seen in similar harvest policy used elsewhere. An evaluation of SUFD conducted in 2008 concluded that the incorporation of the SUFD control rule to a given harvest rate provided the: “...benefit that the spawning biomass threshold was reached less frequently, thus triggering a harvest rate reduction less often.” (Hare and Clark 2008: p.279). In comments citing this reference, IPHC staff noted that “In other words, the SUFD control rule provided a higher average biomass than would be achieved without using this rule.”

In making the 2011 recommendations for catch limits, IPHC staff referenced a new study on SUFD, conducted less than two years after the last study. The new study is narrowly focused on the last four years of declining biomass, rather than the full history of SUFD, and disregards the numerous times the policy has been used to limit increases in catch limits. ALFA members believe the narrow focus of the recent study is inappropriate to evaluate a long-term harvest policy with multiple objectives. The study ignores the use of SUFD as a means of refining and testing new information and, by narrowly focusing on the past four years of decline, does not adequately consider the long-term balancing of this harvest policy. The staff recommendation to use a slow-up, FULL down approach effectively eliminates 2/3rds of any increase the model recommends while immediately implementing full cuts. This represents a return to the Conditional Constant Catch (CCC) policy recommended 6 years ago that, after full review by stakeholders and Commissioners, was abandoned.

**ALFA members recommend against adopting the Slow-up, FULL down policy at this time.** This is an example of the add-hoc approach to management that we find troubling, especially when staff has noticed stakeholders to expect a full review of the harvest policy next year. Measurable outcomes for the proposed change to a FULL down policy should be articulated and the effects of the new policy on the resource and stakeholders should be projected over a reasonable time period (five to ten years and
based on current stock structure). A side-by side-comparison of the old method against the new should also be provided. These projections could then be compared to the apportionment and/or harvest policies that will be newly proposed next year—again with some time for the staff, stakeholders and Commissioners to ground-truth the proposed change.

Re-weighting the Survey for Apportionment
The 2011 staff catch limit recommendations also include a new apportionment method using a different weighting of the survey than was recommended the past three years. This represents the second major apportionment change in three years and ALFA notes the decision to use the survey as an apportionment tool has never been endorsed by the stakeholders nor adopted by the Commission. We are concerned that no comparison has been presented of catch limits based on equal survey weighting and the newly proposed re-weighted approach. As detailed above, stakeholders have repeatedly requested that staff provide a comparison between old and new approaches to allow stakeholder to fully understand the impacts of proposed changes and provide meaningful comment.

With respect to using the new re-weighting approach, the study released by the IPHC on the Kalman filter notes that it assumes the survey measures “true abundance” and will tend to emphasize more recent years over past years because of the precision of the survey. One of the outstanding criticism of survey-based apportionment focuses on the survey’s ability (or inability) to measure true abundance and to evaluate transient effects. Factors effecting catchability (e.g., prey species locally available versus survey bait, water chemistry, tidal state, previous effort on survey station, and direction of the survey set) may vary between areas and years and may prevent the survey from accurately reflecting “true” abundance in any area for any given year. The survey can precisely estimate a number, but whether that number accurately represents “true” abundance is still under discussion. The paper notes that much of the emphasis on recent year data using the Kalman filter comes from the precision of the survey:

“Therefore, if the survey produces a relatively precise estimate each year, but the true mean can change by a large amount between years, little weight will be given to past observations. Conversely, if the survey estimate is imprecise and the process changes little from year to year, past observations are quite informative about the current state of the process and receive greater weight.”

The three year rolling average tended to smooth out these transient effects. The new method, which places such strong emphasis on the recent year survey, adds volatility to the catch limits by emphasizing transient effects. ALFA members question if this added volatility is necessary or beneficial.

Additionally, the Kalman filter presented by staff only looks at the area level of survey variability over the years. ALFA has requested several times that if the survey is going to be used as an apportionment tool then the staff should test the ability of the current ten square mile spacing to accurately estimate true abundance in different habitat types and subareas. We have recommended research to determine proper survey station spacing in
various habitat types, and we have asked for an evaluation of "keystone" sub-areas within an area on the abundance estimate.

In sum, the re-weighted survey recommended by staff again represents an ad-hoc approach to the issue of using the survey as an apportionment tool. It uses a narrow statistical lens to examine the issue of survey weighting and does not address some of the underlying questions and refinements necessary to use the survey as an apportionment tool. And again, the effect of the re-weighting on the resource and stakeholders over a reasonable time period (five to ten years based on current stock structure) was not presented, nor was a side-by-side comparison of the old versus the new method. For these reasons, and the fact that the harvest policy will be completely re-examined next year, ALFA members do not recommend adopting the new-survey re-weighting approach at this time. If the Commissioners consider the survey a reasonable apportionment tool, we request that the Commission establish a deliberative process to refine the survey for this new use, and that this process include a review of other objectives associated with apportionment (e.g., stability and historic dependence).

Bycatch and Wastage
The idea of accounting for all bycatch as specific removals as opposed to the current policy of a broad reduction in the harvest rate has appeal. It would allow the directed fishery in an area to directly benefit from bycatch reduction efforts and begin the process on internalizing the effects of bycatch in the area where it is occurring. However, just implementing the O26-U32 part of the equation this year again represents the ad-hoc approach to which ALFA objects. Staff is still working to understand the impact of U26 bycatch and the downstream effect of these removals. Staff is also re-evaluating the harvest rate for all areas prior to recommending 2012 catch limits. Changing the harvest rate by 1.5% this year only to completely revise it again next year does not make sense. Again ALFA recommends a more deliberative approach to halibut management. We recommend staff further refine options that account for U26 bycatch and incorporate the refined option into a comprehensive plan to revise the harvest rate in 2012. Again: ALFA requests that the staff present the effects on the resource and the stakeholders of the new policy over a reasonable time period of five to ten years based on current stock structure, as well as a side-by-side comparison of the old versus the new method.

Summary
In closing, ALFA members are concerned by the status of halibut stocks, and even more concerned by the rapid and ever changing policies, strategies, and assumptions presented to date by the IPHC staff. We are uncomfortable providing comment to the Commission before the full stock assessment is available for review, and concerned that untested policy changes are again driving staff recommendations for catch limits. For reasons described above and in previous comments, we do not support the survey-based apportionment strategy as currently proposed nor as it has been applied in the past two years. We strongly recommend the Commissioners establish a more deliberative approach to halibut management that allows stakeholders and the Commission the opportunity to ground-truth and review changes proposed by staff BEFORE the changes become the basis for catch limits. Finally, in the strongest possible terms, we urge the
Commission to recommend management measures that restrict 2C halibut charter harvest to the established GHL. No sector should be allowed to exceed its allocation.

Thank you for your time and consideration. ALFA representatives will attend the IPHC Annual Meeting to provide more specific recommendations on 2011 catch limits.

Sincerely,

Linda Behnken
(Director, ALFA)